

MORRISON & FOERSTER LLP  
1290 Avenue of the Americas  
New York, New York 10104  
Telephone: (212) 468-8000  
Facsimile: (212) 468-7900  
Larren M. Nashelsky

UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

	-----X	
	:	
In re:	:	Chapter 11
	:	
LEHMAN BROTHERS HOLDINGS INC., <u>et al.</u> ,	:	Case No. 08-13555 (JMP)
	:	
	:	Jointly Administered
Debtors.	:	
	:	
	-----X	

**VERIFIED STATEMENT OF MORRISON & FOERSTER LLP  
PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019**

Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure, Morrison & Foerster LLP ("Morrison") makes the following disclosure in connection with the chapter 11 cases (the "Cases") of Lehman Brothers Holdings, Inc., and each of its affiliated debtors who have filed Chapter 11 cases (collectively referred to as the "Debtors"):

1. Morrison represents the entities listed on Exhibit A hereto (the "Entities") who may hold claims against and/or interests in the Debtors arising out of applicable agreements, law, or equity pursuant to their respective relationships with the Debtors.
2. Each of the Entities separately requested that Morrison represent them in connection with the Cases.
3. None of the Entities has filed a proof of claim against any of the Debtors as of the time of filing of this Verified Statement.

4. Upon information and belief, Morrison does not currently possess and has not possessed in the past any claims against or interests in any Debtor.<sup>1</sup>

5. Morrison is representing each of these clients individually, with the exception of the Informal Group of Taiwan Financial Institutions, as outlined on Exhibit A, which are being represented collectively. At the time of the filing of this Verified Statement, the clients listed above do not comprise a committee of any kind.

6. The Debtors have sought to retain Morrison as an ordinary course professional in connection with the prosecution by Lehman of a fraud action in Japan. Morrison is in discussions with the Debtors on the terms of its continued representation of the Debtors in that action. Morrison is not aware of any conflict and does not believe that the potential continued representation of the Debtors in such action in Japan gives rise to any conflict of interest with any of the Entities listed on Exhibit A hereto.

7. Morrison will supplement this Verified Statement as applicable in the event Counsel is retained by additional parties in connection with the above-captioned Cases.

Dated: October 17, 2008  
New York, New York

Respectfully submitted,

/s/ Larren M. Nashelsky  
Larren M. Nashelsky  
MORRISON & FOERSTER LLP  
1290 Avenue of the Americas  
New York, New York 10104  
Telephone: (212) 468-8000  
Facsimile: (212) 468-7900

---

<sup>1</sup> However, partners, associates and staff of Morrison may, in their individual capacities, hold claims and/or equity interests in the Debtors.

**EXHIBIT A**

Brookfield Properties One WFC Co., LLC  
Three World Financial Center  
200 Vesey Street  
New York, NY 10281-1021

The Chuo Mitsui Trust and Banking Co., Ltd.  
33-1, Shiba 3-chome,  
Minato-ku, Tokyo 105-8574, Japan

Overseas-Chinese Banking Corporation Limited  
65 Chulia Street  
Singapore 049513

Fondo Latinoamericano de Reservas  
Avenida 82, No. 12-18, Piso 7  
Bogota, Colombia

CB Richard Ellis, Inc.  
100 No. Sepulveda Blvd., Suite 1050  
El Segundo, CA 90245

Pacific Coast Capital Partners, LLC  
12885 Alcosta Boulevard, Suite A  
San Ramon, California 94583

Mitsubishi UFJ Securities Company, Ltd.  
1-1-3 Otemachi  
Chiyoda-ku, Tokyo 100-8138  
Japan

Nippon Life Insurance Company  
1-6-6. Marunouchi, Chiyoda-Ku  
Tokyo 100-8288, Japan

Municipality Finance, PLC  
PO Box 744, Antinkatu 3 C, 5th Floor  
FI-00101 Helsinki, Finland

AB Bankas SNORAS  
Vivulskio 7  
LT-03221  
Vilnius, Lithuania

ING Real Estate Finance (USA) LLC  
230 Park Avenue, 15th Floor  
New York, NY 10169

Fondiaria - SAI S.p.A.  
BIM Vita S.p.A.  
SASA Vita S.p.A.,  
SASA Assicurazioni Riassicurazioni S.p.A.  
Milano Assicurazioni S.p.A.,  
Popolare Vita S.p.A.,  
Banca Sai S.p.A.  
Systema Vita S.p.A.  
Novara Vita S.p.A.  
c/o Fondiaria – SAI S.p.A.  
Piazza della Libertà , 6  
50129 Firenze Italy

The Informal Group of Taiwan Financial Institutions

Chinatrust Commercial Bank Co., Ltd.  
1F., No.3, Songshou Rd.,  
Taipei, Taiwan

Mega International Commercial Bank Co., Ltd.  
No. 123, Sec. 2, Jhongsiao E. Road  
Taipei, Taiwan

UBS AG  
5F. & 13F., No. 7, Song Ren Road  
Taipei, Taiwan

Bank Sinopac  
9-1, Chien Kuo N. Road, Sec. 2,  
Taipei, Taiwan

First Commercial Bank  
30 Chung King South Road, Sec 1  
Taipei, Taiwan

Entie Commercial Bank  
2F, 156 Minsheng East Road, Sec. 3  
Taipei, Taiwan

Taishin International Bank  
44 Zhongshan N. Rd., Sec. 2  
Taipei, Taiwan

Taiwan Securities Co., Ltd.  
12F, No. 96, Sec 1, Jianguo N. Rd.

Taipei, Taiwan  
Ta Chong Bank, Ltd.  
12F, No. 2, Sec. 5, Hing-Yi Road  
Taipei, Taiwan

Chinfon Commercial Bank, Ltd.  
No. 1 Nanyang Street  
Taipei, Taiwan

Bank of Kaohsiung Co., Ltd.  
168 Po Ai 2<sup>nd</sup> Road  
Tsoying District  
Kaohsiung, Taiwan

Union Bank of Taiwan  
3F, No. 109, Min-Sheng E. Rd., Sec. 3  
Taipei, Taiwan

King's Town Bank  
506, Sec 1, Shi-Men Road  
Tainan, Taiwan

Far Eastern International Bank  
26,27/F No. 207 Tun Hwa S. Road, Sec 2  
Taipei Taiwan

Yuanta Commercial Bank  
9F., No. 66, Sec 1, Dunhua S. Road  
Taipei, Taiwan

Jih Sun International Bank  
1F., No. 10, Sec. 1, Chongcing S. Road  
Taipei, Taiwan

Taichung Commercial Bank Co., Ltd.  
No. 87 Mincyuan Road, West District  
Taichung City, Taiwan

Cathay United Bank Company, Ltd.  
7 Song-Ren Road  
Taipei, Taiwan

Jih Sun Securities Co., Ltd.  
3F., No. 111, Sec 2, Nan King E. Road  
Taipei, Taiwan

Shinkong Insurance Co., Ltd.  
11 F., No. 13, Chienkuo N. Road, Sec 2  
Taipei, Taiwan